



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL
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MAURA HEALEY
ATTORNEY GENERAL

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March 31, 2021

Shonda D. Green, Secretary
Department of Telecommunications and Cable
1000 Washington Street, Suite 600
Boston, MA 02118-6500

Re: *Petition of the State 911 Department for Approval of Fiscal Year 2021 Expenditures,
Fiscal Year 2022 Development Grant Amount and Fiscal Year 2022 Regional PSAP
Three to Nine, D.T.C. 21-3*

Dear Secretary Green:

Enclosed please find the Attorney General's Notice of Intervention, Appearance of Counsel, and Certificate of Service. Please file according to your usual practice. Thank you for your assistance in this matter.

Sincerely,

/s/ Jonathan F. Dinerstein

Jonathan F. Dinerstein
Assistant Attorney General

Enclosures

cc: William Bendetson, Presiding Officer
Service List

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

**PETITION OF THE STATE 911
DEPARTMENT FOR APPROVAL OF
FISCAL YEAR 2021 EXPENDITURES,
FISCAL YEAR 2022 DEVELOPMENT
GRANT AMOUNT, AND FISCAL YEAR
2022 REGIONAL PSAP THREE TO
NINE**

D.T.C. 21-3

ATTORNEY GENERAL'S NOTICE OF INTERVENTION

Maura Healey, as she is the Attorney General of the Commonwealth of Massachusetts, hereby gives notice of intervention as of right in the above-captioned matter under the authority specifically granted her by G.L. c. 12, §§10 and 11E and under her common law authority to represent and protect the public interest.

The Attorney General, as the chief law enforcement officer of the Commonwealth, has “broad common law and statutory powers to represent the public interest.” *Commonwealth v. Mass CRINC*, 392 Mass. 79, 88 (1984); *see Sec’y of Admin. & Fin. v. Attorney General*, 367 Mass. 154, 159 (1975) (quoting *Commonwealth v. Kozlowsky*, 238 Mass. 379, 389 (1921)). “[T]he Attorney General has a general statutory mandate, in addition to any specific statutory mandate, to protect the public interest.” *Mass CRINC*, 392 Mass. at 88 (citing G.L. c. 12, § 10); *see also Lowell Gas Co. v. Attorney General*, 377 Mass. 37, 48 (1979) (holding that the Attorney General has a “common law duty to represent the public interest and to enforce public rights”). The Attorney General’s authority to protect the public interest applies to this administrative proceeding, as the Legislature did not intend “to vary the power and duty of the Attorney General to control the conduct of litigation involving the interests of the Commonwealth depending on the forum in which he appears.” *Feeney v. Commonwealth*, 373 Mass. 359, 367

(1998). The Attorney General's Office's interpretation of its own authority should be given the same significant deference of any administrative agency in carrying out a power granted by the legislature. *Dowling v. Registrar of Motor Vehicles*, 425 Mass. 523, 525 (1997) (quoting *Mass. Med. Soc. v. Comm'r of Ins.*, 402 Mass. 44, 62 (1988)).

Respectfully submitted,

MAURA HEALEY
ATTORNEY GENERAL

By: /s/ Jonathan F. Dinerstein
Jonathan F. Dinerstein
Assistant Attorney General
Massachusetts Attorney General
Office of Ratepayer Advocacy
One Ashburton Place
Boston, MA 02108
(617) 727-2200

Dated: March 31, 2021

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APPEARANCE OF COUNSEL

Please enter my appearance on behalf of Maura Healey, the Attorney General of the Commonwealth of Massachusetts, in the above captioned proceeding.

Respectfully submitted,

MAURA HEALEY
ATTORNEY GENERAL

By: /s/ Jonathan F. Dinerstein
Jonathan F. Dinerstein
Assistant Attorney General
Massachusetts Attorney General
Office of Ratepayer Advocacy
One Ashburton Place
Boston, MA 02108
(617) 727-2200

Dated: March 31, 2021

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing documents upon each person designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of 207 C.M.R. 1.05(1). Dated at Boston this 31st day of March, 2021.

/s/ Jonathan F. Dinerstein
Jonathan F. Dinerstein
Assistant Attorney General
Massachusetts Attorney General
Office of Ratepayer Advocacy
One Ashburton Place
Boston, MA 02108
(617) 727-2200